

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

KENTREZ GRANT	§ § § §
Plaintiff,	§ § § §
-vs-	§ § § §
DELTA AIR LINES, INC.,	§ § § §
Defendant.	§ §

Case No.: 1:25-CV-00154ADA

**PLAINTIFF'S REQUESTS for PRODUCTION of
DOCUMENTATION and INTERROGATORIES**

COMES NOW, the Plaintiff, KENTREZ GRANT, requesting production of documents in accordance with Fed. R. Civ. P. Rule 34 and the request of interrogatories in accordance with Fed. R. Civ. P. Rule 33. The Plaintiff and the Defendant had their Rule 26 (f) conference on March 27, 2025. The opposing party ended the Rule 26(f) conference prematurely, not covering the mandatory information of discovery, nor disclosing insurance information during initial disclosure. To alleviate issues with discovery and to avoid injury to either party, the Plaintiff requests that the Court allow these requests and publish a protective order. Attached to this document are Exhibit A -*Plaintiff's Interrogatories of Defendant*, Exhibit B - *Confidentiality and Protective Order*, Exhibit C –*Defendant's Initial Disclosures* sent via email, and Exhibit D- *Email Dated April 10, 2025, Kentrez Grant v. Delta Air Lines Defendant's Initial Disclosures* from opposing party proving **failure to disclose** Fed. R. Civ. P Rule 37 Failure to Make Disclosures or to Cooperate in Discovery; Sanctions.

Dated: **May 21, 2025**

Respectfully Submitted,

/s/ KENTREZ GRANT
Kentrez Grant
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CERTIFICATE OF SERVICE

I hereby certify that on **May 21, 2025**, I electronically submitted the foregoing document with the clerk of the Court for the U.S. District Court, Western District of Texas, and electronically served same using the Case Management/Electronic Case Filing (CM/ECF) system of the Court. I further certify that a true and correct copy of the foregoing was served upon ATTORNEYS FOR DEFENDANT DELTA AIR LINES, INC.: Celeste R. Yeager at email cyeager@littler.com and Josh K. Ordiway at jordiway@littler.com and mailed via USPS at:

LITTLER MENDELSON, P.C.

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